

EXHIBIT P

Howard C. Jordi, Ph.D.

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION
Master File No. 2:12-MD-02327

IN RE: ETHICON, INC. MDL No. 2327
PELVIC REPAIR SYSTEM,
PRODUCTS LIABILITY
LITIGATION

This Document Relates to:
Carolyn Lewis, Et Al v. Ethicon, Inc.
Case No. 2:12-CV-04301

IN THE DISTRICT COURT, 95th JUDICIAL DISTRICT
DALLAS COUNTY, TEXAS

Linda Batiste,

Plaintiff,

v.

Cause No.

John Robert McNabb, M.D.,

DC-12-14350

Johnson & Johnson and Ethicon, Inc.,

Defendants.

DEPOSITION OF HOWARD C. JORDI, Ph.D.
Wednesday, October 30th, 2013
9:05 a.m.

Held At:

Jordi Lab
200 Gilbert Street
Mansfield, Massachusetts

REPORTED BY:

Maureen O'Connor Pollard, RPR, CLR, CSR #149108

Golkow Technologies, Inc. - 1.877.370.DEPS

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1 "The control and explant samples do not show a
2 significant difference in molecular weight."

3 Correct?

4 A. That's correct.

5 Q. Doesn't that mean that there's no
6 evidence in your molecular weight analysis that
7 polypropylene is degrading?

8 A. It might seem so at first
9 consideration. But remember, the only part of
10 the polymer that seems to be degrading based on
11 the SEM photos is the surface.

12 So GPC is a bulk technique, I had to
13 dissolve the inside undamaged region as well as
14 the broken pieces, but I get one sample. The
15 total mixture dissolved.

16 So number one, the effect of the
17 damaged surface -- my point here is I think if
18 we could measure the surface we would see a loss
19 in molecular weight, but I had no way to get
20 enough pieces to measure the molecular weight of
21 only the surface pieces like I did for the
22 infrared spectra.

23 Q. Aren't you speculating what you find?

24 A. I am.

25 Q. Until you have the opportunity to test

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1 as you've described, the fact that your
2 molecular weight testing does not show a
3 significant difference in molecular weight
4 suggests that there's no degradation of the
5 polypropylene. That's the best scientific
6 conclusion you can reach in this data, isn't
7 that true?

8 A. It's one of the conclusions, yes.

9 Q. It's --

10 A. It's not the only one.

11 Q. It's fair to say -- okay.

12 Now, has Jordi Labs analyzed
13 polypropylene mesh for other manufacturers?

14 A. I don't run the day-to-day operations
15 anymore, so I would have no way to answer that
16 question. I don't know what has come in.

17 Q. Do you know?

18 A. I do not know.

19 Q. Do you know whether Jordi Labs
20 analyzed Bard mesh that was at issue in the West
21 Virginia litigation?

22 A. I don't know.

23 Q. Do you know whether Bard mesh has
24 antioxidants in it?

25 A. I haven't been requested to analyze,

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1 COMMONWEALTH OF MASSACHUSETTS)

2 SUFFOLK, SS.)

3 I, MAUREEN O'CONNOR POLLARD, RPR, CLR,
4 and Notary Public in and for the Commonwealth of
5 Massachusetts, do certify that on the 30th day
6 of October, 2013, at 9:05 o'clock, the person
7 above-named was duly sworn to testify to the
8 truth of their knowledge, and examined, and such
9 examination reduced to typewriting under my
10 direction, and is a true record of the testimony
11 given by the witness. I further certify that I
12 am neither attorney, related or employed by any
13 of the parties to this action, and that I am not
14 a relative or employee of any attorney employed
15 by the parties hereto, or financially interested
16 in the action.

17 In witness whereof, I have hereunto
18 set my hand this 1st day of November, 2013.

19

20

21 _____
22 MAUREEN O'CONNOR POLLARD, NOTARY PUBLIC
23 Realtime Systems Administrator
24 CSR #149108
25